

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
 MICHAEL CROOKER,)
 Defendant.)

Criminal No. 04-657 RACN

FILED
CLERK'S OFFICE
JUN 23 10 26 AM
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Motion for Detention Hearing

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. § 3142(e) and (F).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence of life imprisonment or death
- ☐ 10 plus years drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☒ Serious risk of obstruction of justice

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which reasonably will assure (check on or both):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community

3. Rebuttable Presumption

The United State (~~will~~, will not) invoke the rebuttable presumption against defendant pursuant to 18 U.S.C. § 3142(e). If "yes," the presumption applies because (check one or both):

_____ Probable cause to believe defendant committed 10
plus year drug offense or firearms offense, 18 U.S.C. § 924(c)

_____ Previous conviction for "eligible" offense
committed while on pretrial bond

4. Time for Detention Hearing. The United States requests
that the Court conduct the detention hearing,

_____ At first appearance

X After continuance of 2 days (not more than 3)

5. Witnesses. The United States intends to call the
following witnesses:

Proffer of Assistant U.S. Attorney.

The amount of time for direct examination of these witnesses
is estimated to be: one-half hour.

6. Other Matters.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By: Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Dated: June 23, 2004